

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WESAM M. ABDELZAHER,

Plaintiff,

v.

MATT BRIDGE, ET AL.,

Defendants.

**NOTICE OF MOTION**

Case 1:25-cv-03496-JPC-SLC

**PLEASE TAKE NOTICE** that upon this Notice of Motion, the accompanying Memorandum of Law in Support of the Motion to Dismiss the Complaint dated June 24, 2025, the annexed Declaration of Simone R.D. Francis dated June 24, 2025 and exhibits attached thereto and upon all the prior pleadings and proceedings herein, Defendants Matt Bedient Bridge and Google LLC (“Defendants”), through the undersigned counsel, will move this Court at the United States Courthouse for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street New York, New York 10007 before the Honorable Sarah L. Cave, at a date and time to be determined by this Court, for an order pursuant to Rule 12(b) of the Federal Rules of Civil Procedure, dismissing all claims against Defendants with prejudice in their entirety, and awarding such other relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Rule 6.1 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, (1) any opposing affidavits and answering memoranda of law shall be served within fourteen days after service of the motion papers, and (2) any reply affidavits shall be served within seven days after service of the answering papers.

Dated: New York, New York  
June 24, 2025

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

By: *Simone R. D. Francis*

Simone R. D. Francis, Esq.  
Marc-Joseph Gansah, Esq.  
599 Lexington Avenue, 17th Floor  
New York, NY 10022  
340-714-5510  
212-492-2068  
Simone.francis@ogletreedeakins.com  
Marcjoseph.gansah@ogletreedeakins.com  
*Attorneys for Defendants*